



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality Permit

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Rules, Chapter 391-3-1, adopted pursuant to and in effect under that Act,

Facility Name: WestRock Lithia Springs Preprint Plant

Facility Address: 600 Riverside Parkway, Building A
Lithia Springs, Georgia 30122 Douglas County

Mailing Address: 600 Riverside Parkway, Building A
Lithia Springs, Georgia 30122

Facility AIRS Number: 04-13-097-00089

is issued a Permit for the following:

Operation of a printing facility, construction and operation of a new digital printer and a change in operating status from a Title V major source to a synthetic minor source.

This Permit is issued for the purpose of establishing practically enforceable emission limitations such that the facility will not be considered a major source with respect to Title V of the Clean Air Act Amendments of 1990.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 28395 dated May 9, 2022; any other applications upon which this Permit is based; supporting data entered therein or attached thereto; or any subsequent submittals or supporting data; or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 6 pages.



Richard E. Dunn, Director
Environmental Protection Division

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1. General Requirements

- 1.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate this source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection or surveillance of the source.
- 1.2 The Permittee shall not build, erect, install or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged into the atmosphere.
- 1.3 The Permittee shall submit a Georgia Air Quality Permit application to the Division prior to the commencement of any modification, as defined in 391-3-1-.01(pp), which may result in air pollution and which is not exempt under 391-3-1-.03(6). Such application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. The application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity and pollutant emission rates of the plant before and after the change, and the anticipated completion date of the change.
- 1.4 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and shall be retained for at least five (5) years following the date of entry.
- 1.5 In cases where conditions of this Permit conflict with each other for any particular source or operation, the most stringent condition shall prevail.

2. Allowable Emissions

- 2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the entire facility, volatile organic compounds (VOC) in amounts equal to or exceeding 100 tons during any twelve consecutive month period.
[Title V Avoidance]
- 2.2 The Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.
[391-3-1-.02(2)(b)]

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- 2.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any source, particulate matters (PM) in total quantities equal to or exceeding the allowable rate as calculated using the applicable equation below, unless otherwise specified in this Permit.
[391-3-1-.02(2)(e)]

- a. $E = 4.1P^{0.67}$, for process input weight rate up to and including 30 tons per hour;
- b. $E = 55P^{0.11} - 40$, for process input weight rate in excess of 30 tons per hour.

Where E equals the allowable particulate emission rate, in pounds per hour and P equals the process input weight rate in tons per hour.

- 2.4 The Permittee shall use only inks and coatings in Flexographic Printing Press 1 with VOC content, as applied, equal to or less than one of the following:
[391-3-1-.02(2)(mm)1.(i)]

- a. 25 percent by volume of the volatile content of the coating or ink; or
- b. 40 percent by volume of the coating or ink, minus water, or
- c. 0.5 pounds of VOC per pound of coating solids.

- 2.5 The emission limits of Condition 2.4 shall be achieved by implementing the following option. The Permittee may apply any of the compliance options to an individual ink/coating, or to an entire printing line. However, the Permittee may not use different compliance options at the same time on the same printing line.
[391-3-1-.02(2)(mm)]

- a. The application of low solvent technology where each and every ink and coating meets the appropriate limits stated in Condition 2.4.

- 2.6 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from Flexographic Printing Plate Processors 1 and 2, combined, volatile organic compound (VOC) emissions in amount equal to or exceeding 10 tons during any consecutive 12-month period. This limit applies at all times.
[391-3-1-.02(2)(tt)1.]

- 2.7 The Permittee shall not operate the flexographic plate making processors without being equipped with a closed-loop solvent recovery system.
[391-3-1-.02(2)(tt)1.]

- 2.8 The Permittee shall use inks and coatings in the digital press with VOC content, as applied, equal to or less than 5 percent, by weight, (0.05 lb. VOC per lb. ink or coating) of the inks and coatings. This limit applies at all times.
[391-3-1-.02(2)(tt)1.]

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- 2.9 The Permittee shall ensure that any storage tank with a capacity greater than 4,000 gallons, that contains a volatile organic liquid be equipped with submerged fill pipes.
[391-3-1-.02(2)(vv)]
- 2.10 The Permittee shall use adhesive or adhesive primer with VOC content equal to or less than 1.0 pounds per gallon, excluding water, when used with porous material (except wood) substrates.
[391-3-1-.02(2)(yyy)1.(ii)]

3. Fugitive Emissions

- 3.1 The Permittee shall take all reasonable precautions in order to minimize spills and evaporation of VOC-containing cleaning solutions and shall store all VOC-laden cleaning materials – including shop towels, rags and mop heads – in covered containers immediately after use, and dispose of the materials by acceptable means. The covered containers must be designed to adequately contain vapors and must be in good working condition.
[391-3-1-.02(2)(a)10; 391-3-1-.02(2)(mm)4. for Flexographic Printing Press P1; and 391-3-1-.02(tt)1. for HP Digital Press DP1]

4. Process & Control Equipment

Not applicable.

5. Monitoring

- 5.1 The Permittee shall conduct a monthly inspection to assess compliance with Condition 3.1. The Permittee shall maintain an inspection log recorded in a permanent form suitable for inspection and submission to the Division.
[391-3-1-.02(6)(b)1]

6. Performance Testing

- 6.1 The Permittee shall cause to be conducted a performance test at any specified emission point when so directed by the Division. The following provisions shall apply with regard to such tests:
- a. All tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants.
 - b. All test results shall be submitted to the Division within sixty (60) days of the completion of testing.

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- c. The Permittee shall provide the Division thirty (30) days prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test, and shall provide with the notification a test plan in accordance with Division guidelines.
- d. All monitoring systems and/or monitoring devices required by the Division shall be installed, calibrated and operational prior to conducting any performance test(s). For any performance test, the Permittee shall, using the monitoring systems and/or monitoring devices, acquire data during each performance test run. All monitoring system and/or monitoring device data acquired during the performance testing shall be submitted with the performance test results.

7. Notification, Reporting and Record Keeping Requirements

- 7.1 The Permittee shall maintain monthly usage records of all VOC containing materials used at the entire facility. These records shall include the total weight of each material used and the VOC content of each material (expressed as a weight percentage). If the Permittee wishes to subtract the volatile content of waste materials from the VOC emissions calculations, the records must also indicate the weight of any containerized material disposed as waste, the VOC content of the containerized waste material, and documentation of the method for determining the VOC content of the waste material. These records shall be kept available for inspection by or submittal to the Division for five years from the date of record.
[391-3-1-.02(6)(b)1.]
- 7.2 The Permittee shall use the records required in Condition 7.1 to calculate total monthly VOC emissions from the entire facility. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in Condition 7.1. The Permittee shall notify the Division in writing if the monthly VOC emissions from the entire facility exceed 8.3 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.
[391-3-1-.02(6)(b)1.]
- 7.3 The Permittee shall use the monthly VOC emission data required in Condition 7.3 to calculate the combined 12-month rolling total of VOC emissions from the entire facility for each calendar month. The Permittee shall notify the Division in writing if the combined 12-month rolling total of VOC emissions from the entire facility equals or exceeds 100 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.1.
[391-3-1-.02(6)(b)1.]

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- 7.4 The Permittee shall use the records required in Condition 7.1 to calculate combined total monthly VOC emissions from Flexographic Printing Plate Processors 1 and 2, combined. All demonstration calculations, including any Division-approved emission factor, control efficiency and/or coating transfer efficiency used in the calculations, shall be kept as part of the records required in Condition 7.1. The Permittee shall notify the Division in writing if the combined total monthly VOC emissions from the flexographic plate processor exceed 0.83 tons during any calendar month. This notification shall be postmarked by the fifteenth day of the following month.
[391-3-1-.02(6)(b)1.]
- 7.5 The Permittee shall use the monthly VOC emission data required in Condition 7.4 to calculate the combined 12-month rolling total of VOC emissions from Flexographic Printing Plate Processors 1 and 2, combined, for each calendar month. The Permittee shall notify the Division in writing if the combined 12-month rolling total of VOC emissions from Flexographic Printing Plate Processors 1 and 2 equals or exceeds 10 tons. This notification shall be postmarked by the fifteenth day of the following month and shall include an explanation of how the Permittee intends to attain compliance with the emission limit in Condition 2.6.
[391-3-1-.02(6)(b)1.]
- 7.6 The Permittee shall use the following records and calculation methods to demonstrate compliance with the VOC emission limit in Condition 2.8. All calculations used to determine compliance with Condition 2.8 shall be kept as part of the record.
[391-3-1-.02(6)(b)1.]
- a. Maintain a monthly record of the following information/data for the specific painting/coating line:
- (i) The total quantity of each coating or ink used each day in units of pounds (lbs), as applied.
- (ii) The weight fraction of VOC in each coating or ink, as applied.
- 7.7 The Permittee shall use the following records and calculation methods to demonstrate compliance with the VOC emission limits in Condition 2.4. All calculations used to determine compliance with Condition 2.4 shall be kept as part of the record.
[391-3-1-.02(6)(b)1.]
- a. Content Limit Option of Condition 2.5a.: The Permittee shall maintain a record of manufacturer formulation data (e.g., MSDS, CPDS, or Laboratory Content Analysis Reports) for each and every ink, coating and thinner, as received and calculations expressing the VOC content of each ink and coating, as delivered to the applicator, as pounds of VOC per gallon of ink or coating.

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- 7.8 The Permittee shall notify the Division of any issues that prevent the closed-loop solvent recovery system from functioning as required in Condition 2.7 for the flexographic plate making processors as required in Condition 2.7. This notification shall be postmarked by the fifteenth day of the following month.
[391-3-1-.02(6)(b)1.]
- 7.9 The Permittee shall use the following records and calculation methods to demonstrate compliance with the VOC emission limit in Condition 2.10. All calculations used to determine compliance with Condition 2.10 shall be kept as part of the record.
[391-3-1-.02(6)(b)1.]
- a. Maintain a monthly record of the following information/data for the specific painting/coating line:
- (i) The name of each adhesive or adhesive primer used with porous material substrates.
 - (ii) The VOC content of each adhesive or adhesive primer (pounds per gallon), excluding water.

8. Special Conditions

- 8.1 At any time that the Division determines that additional control of emissions from the facility may reasonably be needed to provide for the continued protection of public health, safety and welfare, the Division reserves the right to amend the provisions of this Permit pursuant to the Division's authority as established in the Georgia Air Quality Act and the rules adopted pursuant to that Act.
- 8.2 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of the fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Application & Annual Permit Fees."
- 8.3 All Georgia Air Quality Permits previously issued to this facility, including Air Quality Permit No. 2679-097-0089-V-02-0, are hereby revoked in their entirety.